

USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <u>7-17-15</u>

POMERANTZ LLP

Murielle Steven Walsh
Partner

MEMO ENDORSED

July 16, 2015

VIA ECF:
The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 11D
New York, New York 10007

Application granted.
SO ORDERED
[Signature]
USDJ
7-17-15

Re: *In re Retrophin Inc. Securities Litigation*, No. 1:14-cv-08376-PKC

Request for Permission to File an Omnibus Memorandum of Law in
Opposition to Defendants' Motions to Dismiss

Dear Judge Castel:

We are lead counsel for Lead Plaintiff in the above-captioned action. We write pursuant to Rule 1(A) of your Honor's Individual Rules of Practice to respectfully request permission to file a 50-page omnibus memorandum of law opposing ("Omnibus Opposition Memorandum") Defendants' motions to dismiss the First Amended Consolidated Complaint for Violations of the Federal Securities Laws (the "Amended Complaint") (Dkt. No. 18), which is due on July 27, 2015.

On June 26, 2015, (i) Defendant Martin Shkreli filed a 25-page memorandum of law supporting his motion to dismiss the Amended Complaint (Dkt. No. 44), (ii) Defendant Marc L. Panoff filed a 20-page memorandum of law supporting his motion to dismiss the Amended Complaint (Dkt. No. 41), and (iii) Defendants Retrophin, Inc., Stephen Aselage, Steve Richardson, and Cornelius Golding filed a 25-page memorandum of law supporting their motion to dismiss the Amended Complaint (Dkt. No. 46).

Since many arguments asserted in Defendants' memoranda of law supporting their motions to dismiss overlap, we believe that filing an Omnibus Opposition Memorandum will be more efficient for your Honor's deliberation. Instead of seeking to file 3 separate 25-page memoranda of law opposing each motion to dismiss, potentially totaling 75 pages, we respectfully request permission to use 50 pages for the Omnibus Opposition Memorandum, since several of the arguments asserted in Defendants' memoranda of law do not overlap. The defendant groups each still have the opportunity to file 10-page reply memoranda of law further supporting their motions to dismiss, potentially totaling 30 pages.

We have conferred with Defendants: we initially asked them for consent to file a 55-page Omnibus Opposition Memorandum; Defendants said that they would only consent to 35 pages; we then conceded to asking for only 50 pages; to date, two of the Defendant groups said that they still would only consent to 35 pages.

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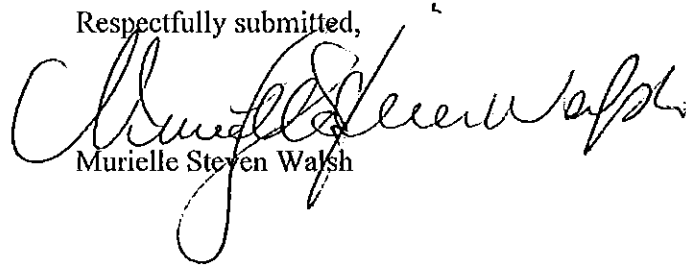
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We are available at the Court's convenience to address any questions or concerns.

Respectfully submitted,



Murielle Steven Walsh

cc: All counsel of record (via ECF)